

Exhibit A

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEW JERSEY
3 TRENTON DIVISION
4 Case No. 3:20-cv-13509-FLW-DEA

5 ANDREW RITZ AND MICHAEL RITZ,)

6 Plaintiffs,)

7 -vs-)

8 NISSAN-INFINITI LT; TRANS)

9 UNION, LLC; EQUIFAX)

10 INFORMATION SERVICES, LLC; and)

11 EXPERIAN INFORMATION SOLUTIONS,)

12 INC.,)

13 Defendants.)

14 DEPOSITION OF ALLISON EDMOND

15 The deposition upon oral examination of
16 ALLISON EDMOND, a witness produced and sworn before
17 me, Craig Williams, RPR, CMRS, a Notary Public in
18 and for the County of Marion, State of Indiana,
19 taken on behalf of the Plaintiffs, via remote Zoom
20 videoconference, on the 2nd day of August 2021,
21 scheduled to start at 9:00 a.m., pursuant to the
22 Federal Rules of Civil Procedure with written
23 notice as to time and place thereof.
24
25

1 It's my job to analyze whatever facts have
2 been presented to me by a contracted party and
3 then forward that on to that specific department
4 in Account Services to rereview it, fully
5 investigate it, and handle it as they see fit
6 after their investigation.

7 Q I'm just going to ask this one more time just to
8 see if I can get an answer for this. So you
9 just again told me what you do. My question
10 isn't about what you do. My question is about
11 how you decide, having done those things that
12 you do, whether something is accurate. How do
13 you come to know whether it is or it isn't?

14 MR. SIMOES: Objection as to form.

15 Q Not what do you do. After having looked at
16 having that you did, looked at all the
17 documents, looked at facts, what measure are you
18 using, what standard are you using to say this
19 is accurate, this is not accurate?

20 MR. SIMOES: Objection as to form.

21 A All I can do is surmise from what I've reviewed
22 at the facts at hand. And that's why I forward
23 it to a department that has specifically been
24 trained to investigate and analyze any type of
25 credit bureau credit reporting data to handle